

# **EXHIBIT 21**

# **REDACTED**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

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WAYMO HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF WILLIAM MCCANN

SAN FRANCISCO, CALIFORNIA

WEDNESDAY, JULY 12, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2653398

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1 the way that [REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED] 15:11  
4 A Yes, in a particular way, yes. 15:11  
5 Q Okay. The idea of [REDACTED] [REDACTED]  
[REDACTED] is that something that 15:11  
7 you were aware of before you did it at Waymo? 15:11  
8 MR. JAFFE: Objection; form. 15:11  
9 THE WITNESS: Knowledge of specifically using 15:12  
10 [REDACTED] [REDACTED]  
[REDACTED] 15:12  
12 MR. MUINO: Sure. 15:12  
13 THE WITNESS: I was not aware of [REDACTED] 15:12  
14 before Waymo or Google. 15:12  
15 MR. MUINO: Okay. 15:12  
16 Q Were you aware of [REDACTED] [REDACTED]  
[REDACTED] a beam of light? 15:12  
18 A Yes. 15:12  
19 Q In what context were you aware of that? 15:12  
20 A Well, I mean, I'm not an optical engineer, 15:12  
21 but, you know, when you move optical lens elements, 15:12  
22 it -- it moves light around. So yes, you can. 15:12  
23 Q Would you say that's a pretty fundamental 15:12  
24 known concept? 15:12  
25 A That moving an optical element around moves 15:12

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1 light? Yes. That's the fundamentals of optics. 15:12

2 Q Okay. 15:12

3 A However, at -- you know, this is a very 15:12

4 specific -- like, it's not really the same thing here; 15:12

5 okay? 15:13

6 Q But, moving a -- repositioning a lens in 15:13

7 order to steer a beam of light is a pretty fundamental 15:13

8 concept in optics; correct? 15:13

9 MR. JAFFE: Objection; form. 15:13

10 A Fundamental to who? 15:13

11 MR. MUINO: Q. In optics -- in the field of 15:13

12 optics? 15:13

13 A I'm not an optical engineer. I can't speak 15:13

14 to that. 15:13

15 Q To your knowledge? 15:13

16 A To my knowledge of optics, it is -- you're 15:13

17 saying -- asking me if it's common -- it's common to 15:13

18 move a lens to move light? 15:13

19 Q Yes. 15:13

20 A I think it depends on the application of it. 15:13

21 I'm not -- if you can be more specific about that, or 15:13

22 maybe restate it, rephrase it. 15:14

23 Q Yeah, well, just following up on what -- 15:14

24 A Sure. 15:14

25 Q -- what we've already discussed, the idea of 15:14